



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUTHENTICATION

I, Cecil Rodrigues, attest that I am the Director of the Hazardous Site Cleanup Division for Region III of the United States Environmental Protection Agency. Based on information supplied to me by employees under my supervision and employees in the Environmental Protection Agency, Region III's Office of Regional Counsel, I attest that the attached documents are true, correct and compared copies of the following documents in my legal custody:

Letter from Mark L. Manewitz, Exxon Company USA, dated January 29, 1986 to Francesco Barba, United States Environmental Protection Agency, Region III, re: Comprehensive Environmental Response, Compensation and Liability Act, Section 104(e) response letter with the affidavit of W.J. Stack, Esq. attached.

Subscribed under penalty of perjury.

Date: 5/6/2015

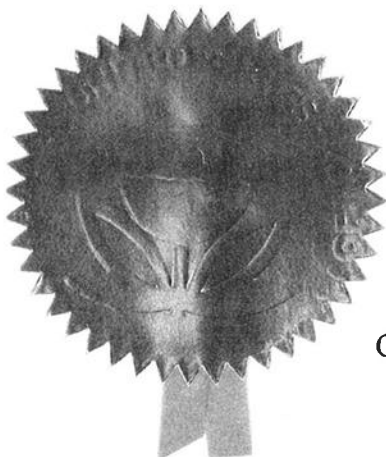
Cecil Rodrigues
Cecil Rodrigues, Director
Hazardous Site Cleanup Division

CERTIFICATION

I, Mary B. Coe, certify that I am the Acting Regional Counsel for Region III of the United States Environmental Protection Agency, that I have duties in Pennsylvania and that the Official whose signature appears above has legal custody pursuant to 40 C.F.R. § 2.406 of the original documents of which copies are attached, as witnessed by my signature and the official seal of the United States Environmental Protection Agency which appear below.

Date: 5/6/15

Mary B. Coe
Mary B. Coe
Acting Regional Counsel



CERTIFICATION



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Full Text Search on: J. Stack Site(s): R03: BUTLER MINE TUNNEL (PAD980508451)

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Displaying 1 - 5 of 5 documents

<u>Region</u>	<u>Doc ID</u> ▲	NR/AR	Action Type	<u>Doc Date</u>	<u>Title</u>	Hits	Images
03	106504	A		01-29-1986	104(E) RESPONSE - EXXON CO USA	8	19
03	106824	A		09-11-1996	BUTLER MINE TUNNEL ADMINISTRATIVE RECORD FILE INDEX OF DOCUMENTS	2	89
03	227450			01-29-1986	104(E) RESPONSE - EXXON CORP (RELATED DOCUMENTS ATTACHED)	8	18
03	2188597	X		04-30-1987	TECHNICAL SUPPORT DOCUMENT	2	88
03	2188598	X		01-01-1111	PACKET OF EXHIBITS NOS. 8 - 25	10	589

201 474 - 7757

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EXXON COMPANY, U.S.A.
POST OFFICE BOX 222 • LINDEN NEW JERSEY 07036-0222

MARK L. MANEATZ
COUNSEL

January 29, 1986

Francesco Barba
Compliance Officer
USEPA, Region III
CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

Butler Tunnel Site
Pittston, Luzerne County
Pennsylvania

Dear Mr. Barba:

The following response is made on behalf of Exxon Corporation's site at Linden, New Jersey for the Bayway Refinery and the Bayway Chemical Plant and at Bayonne, New Jersey for Exxon Company, USA and Exxon Chemical Americas facilities at that site.

In answer to question No. 1:

Exxon has no record of any type or quantity of hazardous substances being sent to the Butler Tunnel site.

In answer to question No. 2:

There are no dates upon which such substances were sent, since no record of any transactions are in Exxon's possession.

In answer to question No. 3:

This question is not applicable.

In answer to question No. 4:

There is no correspondence regarding such substances.

AR202610

In answer to question No. 5:

There is no record of correspondence with respect to such substances with third parties.

In response to question No. 6:

Exxon is aware through publicly available transcripts of the Scatena proceedings that there may be other persons who generated, stored, treated, transported, disposed or arranged for the treatment, disposal or transportation of hazardous substances through Hudson Oil to the Butler Tunnel site. In addition, there are numerous newspaper accounts relating to such activities. Since these documents are in the public domain, we have not attached them to this transmittal. If a copy of the Scatena trial transcripts is required, an arrangement can be made to obtain that transcript.

In response to question No. 7:

Exxon has no deeds, right-of-way, leases or other real interest in the Butler Tunnel site.

In response to question No. 8:

Exxon Company, USA and Exxon Chemical Americas have used the Hudson Oil Refinery Company as a transporter of petroleum products from the Exxon Bayway and Bayonne facilities. Documentation of that relationship has previously been submitted to Region III. A copy of the affidavit of Mr. W. J. Stack, attorney for Exxon Company, USA and the written acknowledgement of receipt dated May 7, 1980 by Ruthann Gordon, Esq., Attorney for Region III is attached. A number of the documents were transmitted in the original since they were light copies from carbons of documents in the Exxon files. Since those documents would not copy effectively, the original documents are in the possession of EPA Region III and Exxon has no copies of those tissue originals.

It was Exxon's understanding with Region III at the time the documents were produced that they would be kept by Region III and if required for any other purposes, Exxon would be made aware of the disposition of documents. Since we have received no notice that the documents have been moved in any way, it is our presumption that they are in the possession of Region III in accordance with the understanding. Also attached are some recent relevant internal memorandums.

Very truly yours,

Mark L. Manewitz
Mark L. Manewitz

MLM/cm

c: P. T. Dow
D. J. Mahoney, Jr.

AR202611

EXXON CHEMICAL AMERICAS

P O Box 3272 Houston Texas 77001

DAVID D SIGMAN
Counsel

October 31, 1983

TO: E. D. Ackerman M. L. Manewitz
C. R. Ball J. A. Morovitz
R. M. Cardillo J. E. Phillips, Jr.
G. R. LeClercq G. A. Rizzo, Jr.
R. W. MacDonald

FROM: D. D. Sigman

RE: Long Island City, NY, Hudson Oil Waste Site--
Demand Letter of the New York Department of Sanitation

Enclosed is a copy of the demand letter from the City of New York, Department of Sanitation, requesting Exxon, as a generator of hazardous waste stored at the Hudson Oil Waste Site, to compensate the City of New York for a portion of the 2-3 million dollars which it has spent to clean up the site. This site is not a Superfund site and was used as a waste oil recovery facility by various owners including Quanta Resources, New Town Oil, Anchor Oil, Hudson Oil and others. Each of these companies was owned at one time by Russ Mahler who has been tried and convicted and who is now serving a prison sentence in Pennsylvania for illegal disposal of waste oil down a mine shaft in that state.

Quanta Oil, which was the last owner of the site, went bankrupt in 1981, and thereafter the City of New York initiated total clean up of the material at that site, which included waste oils and some contaminated PCB oil. To date the City has spent approximately 3 million dollars removing waste oil and cleaning up the site. The City has made its claim at this time in order avoid the claim being barred by the Statute of Limitations under Section 112(a) of Superfund. We understand that a similar letter has been sent out to 250 other parties who were or who may be potentially responsible for materials transferred to the site.

During the middle 1970's, Exxon Company U.S.A and Exxon Chemical Company did business with one or more of the companies operating the site. Our present information indicates that separator skimmings and off-spec paramins waste oils were sent to the site by ECA Bayway and Bayonne operations. ECA's Bayway

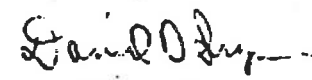
AR202612

Environmental Coordinator is doing further research of his records to determine how much of these materials was sent to the site by Exxon Chemical Americas. Presently the City of New York is making an attempt to gather as much information as possible about the site to determine the quantity of materials shipped to the site by each of the potentially responsible parties, as well as information on the character of such materials.

We expect further investigative demands to issue from the City of New York. As such further demands or information become available concerning the site and ECA's allocated share of the clean up, I shall furnish the information to you.

Enclosed, along with the request letter from the City of New York, is a response on behalf of Exxon by Mark Manewitz of the Bayway Law Department.

If you have any questions, please contact me.


David D. Sigman

DDS/pjo
Attachments

AR202613

OCT 13 1983



THE CITY OF NEW YORK Department of Sanitation

KEVIN T. S.
INSPECTOR GENERAL

51 CHAMBERS STREET
NEW YORK, NY 10007
(212) 566-563

BAYWAY REFINERY
LAW DEPT.

OCT 17 1983

RECEIVED

October 11, 1983

CC: T. V. L. ER
C. R. Ball
D. S. G. MAN
S. C. G. R. A. N
F. T. I

EXXON COMPANY U.S.A.
1400 Park Avenue
Linden, New Jersey 07036

Pursuant to Section 112(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("the Act") of 1980 (42 U.S.C. 9601 et. seq.), the City of New York hereby presents to you a claim pursuant to Section 111 of the Act, as a person who is liable under Section 107 of the Act for the release of hazardous substances.

Specifically, you were the generator of hazardous substances which were stored at a facility located at 37-80 Revere Avenue in Long Island City New York, from which there is a release or threatened release of these hazardous substances. You may be liable for all costs of removal or remedial action incurred by the City of New York and any other necessary costs of response incurred by the City of New York and damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from such release. Although the estimated costs of response and remedial action have not yet been finally determined, immediate response costs are in excess of two million dollars.

In accordance with Section 112(a) of the Act, if this claim has not been satisfied within sixty (60) days of this demand, the City of New York may elect to commence an action in court for payment.

Please address inquiries to:

Richard Bowers, Esq., General Counsel
New York City Department of Environmental Protection
Municipal Building - Rm. 2358
New York, New York 10007 (212) 566-5240

Sincerely,

Daniel Millstone
Daniel Millstone
Environmental Counsel

AR202514
NEW YORK
LET'S CLEAN UP
NEW YORK



EXXON COMPANY, U.S.A.
POST OFFICE BOX 222 • LINDEN, NEW JERSEY 07036

MARK L. MANEWITZ
ATTORNEY

October 17, 1983

City of New York
Department of Sanitation
51 Chambers Street
New York, NY 10007

Attention: Richard Bowers, General Counsel

Re: 37-80 Review Avenue Facility
Long Island City, NY

Dear Mr. Bowers:

I received Mr. Millstone's letter dated October 11, 1983 in which a claim is made pursuant to section 112(a) of the Comprehensive Environmental Response Compensation Liability Act (Superfund).

As you can understand, it is difficult for Exxon to respond to the claim that it is a person liable under section 107 of Superfund for the release of hazardous substances, unless you can provide us with information sufficient for Exxon to make a judgment as to its validity. There're estimated costs of response and remedial action in excess of two million dollars in your letter, but no claim is made as to what amount Exxon is being asked to pay, nor is it alleged that Exxon has any specific proportionate responsibility.

Section 112(a) of Superfund provides that claims may be asserted against the Fund where presented first to a person "known to the claimant who may be liable under section 107 of this title." It would be helpful for us if information which formed the basis upon which the City of New York sent the letter of October 11, 1983 could be presented to Exxon for its review.

Please provide the undersigned with all information and documents which form the basis of your allegations which caused you to write this letter. In addition, if it is available, please provide the specific itemization of costs for which you are asking Exxon to respond. Such information is probably necessary under Superfund for you to make a sufficient claim. If you wish to discuss this matter, please contact the undersigned at (201) 474-7757.

Very truly yours,

Mark L. Manewitz
Mark L. Manewitz

MLM:cam

cc: C. R. Ball
S. Brown
E. Galante
D. J. Mahoney, Jr.
R. Quay
D. Sigman
J. Van Ert
S. Curran

A DIVISION OF EXXON CORPORATION

EXXON AR202615
OCT 21 1983
LAW DEPT.

E.R. Dall

EXXON COMPANY, U.S.A.
A DIVISION OF EXXON CORPORATION

BAYWAY REFINERY

EXXON CHEMICAL AMERICAS
A DIVISION OF EXXON CHEMICAL COMPANY
A DIVISION OF EXXON CORPORATION

BAYWAY CHEMICAL PLANT

October 24, 1983

**R. W. Upchurch
Exxon Company, USA
Houston**

**D. S. Sanders
Exxon Chemical Americas
Houston**

**Re: 37-80 Review Avenue
Long Island City, New York
Demand Under Superfund
From the City of New York**

On October 17, 1983, Exxon received the attached claim under section 112(a) of Superfund from the City of New York, Department of Sanitation. The claim concerns a site in Long Island City at which various companies conducted a waste oil recovery business. The owners of the site included Quanta Resources, Newtown Oil, Anchor Oil Corp., Ag-Met Oil Services, Portland Holding Company and Hudson Oil. Each of these companies was owned at one time by Russ Mahler, now serving time for dumping in Pennsylvania. As you will recall, Exxon was contacted by various agencies in the matter of Mr. Mahler's illegal dumping down a mineshaft in Pennsylvania. Exxon has cooperated with both State and Federal authorities in the investigation of Mr. Mahler. In fact, a witness was made available to the Pennsylvania Grand Jury, but no testimony was required.

The site on Long Island does not appear on the Superfund list. Quanta Oil, which was the last owner of the site, went bankrupt in 1981. At that time the trustee in bankruptcy abandoned the site and the City was faced with a cleanup of PCB contaminated oil stored at the location. The City of New York spent about \$3 million dollars in its surface cleanup which is substantially completed. This includes cleaning tanks at the site and removing contaminated soil.

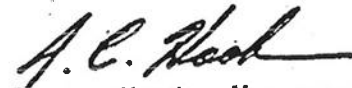
AR202616


In order to make a claim for reimbursement of those funds expended, the City needed to send out a claim under section 112(a) before the statute of limitations expired. In an effort to preserve their rights to claims under Superfund, or to sue other responsible parties, the City sent out 250 letters to those persons which did business with any of the corporations which were at the site.

During the middle 1970's, Exxon Company, USA did business with some of the companies as noted in the attached EUSA HQ memo dated 3/15/83. Our present information indicates that it is probable that separator skimmings and off-spec Paramins waste oils were sent to the site from the Exxon Chemical Bayway/Bayonne operations. Additional research will need to be done.

At this time, the City of New York is trying to gather information. It is not acting with respect to specific knowledge regarding the responsibility of each individual at the site. It is the City's intention to move forward with this investigation and at that time there can be expected additional demands for information from Exxon as to its involvement with the site.

Currently, the records of Bayway both for the Chemical and Refining operations are being reviewed and the terminals in the metropolitan area are conducting a records search to determine whether Marketing has done business with the site.


J. C. Hook, Manager
Bayway Refinery


S. W. Dedman, Manager
Bayway Chemical Plant

cc: C. R. Ball
S. Brown
S. Curran
J. Johnson
R. W. MacDonald
D. J. Mahoney, Jr.
M. L. Manewitz
J. A. Morovitz
D. Sigmen
W. Taetzsch
J. Van Ert

AR202617

PLACE	1	2	3	4	5	6	7
DATE							
TIME							
MAR 15 1983							
RECEIVED							
R. W. UPCHURCH							

March 15, 1983

TO: Mr. R. W. Upchurch

FROM: J. M. Johnson

SUBJECT: Bayway Wastes Which May Have Been Disposed of by Quanta

I have obtained the following information from Bill Taetzsch of Bayway concerning the mention of the Bayway Refinery in the attached article:

1. Neither the refinery nor the chemical plant dealt directly with Quanta. Both, however, dealt with a company first known as Northeast Waste Disposal, later as Newtown Waste Disposal, and finally as Hudson Oil. Investigations by EPA and several states in 1979-80 revealed that Northeast/Newtown/Hudson was linked to Quanta, and the government agencies believe that some of the Exxon wastes (along with wastes from many other companies) were disposed of illegally by Quanta.
2. The last EUSA involvement with Hudson Oil was August, 1979. Bayonne had a contract with Hudson to dispose of some slop oil, and it was Bayonne's understanding that the slop oil would be re-refined at Hudson's Edgewater, N.J. facility.
3. From 1976 to 1978, Bayway Refinery had a contract with Hudson to dispose of spent white oil filter clay. Bayway's understanding was that Hudson was recovering oil from the clay and disposing of essentially oil-free clay in a landfill. Subsequent investigations by EPA suggest that Hudson disposed of the oily clay illegally in a municipal landfill on Staten Island.
4. The Bayway Chemical Plant had a contract with Northeast/Newtown/Hudson in the 1976-79 period for the disposal of West Side Chemical Plant slop oil.
5. Exxon's information concerning the above waste disposal contracts with Northeast/Newtown/Hudson was given to EPA in 1980.

Jer

JMJ:cw

c: Mr. J. G. Handy
Mr. J. W. Van Ert
Mr. W. L. Taetzsch

AR202618

EXXON COMPANY, U.S.A.
POST OFFICE BOX 222 • LINDEN, NEW JERSEY 07036

WILLIAM J. STACK
ATTORNEY


May 12, 1980

Re: Hudson Oil

MEMO TO: R. K. Altreuter
C. R. Ball
C. S. Kuczynski
K. P. Northup

FROM: W. J. Stack

Attached is a copy of my affidavit and the EPA's acknowledgment of receipt of the documents forwarded to them in response to their subpoena. If there are any further developments in regard to this matter, I will advise/contact each of you.


W. J. Stack

WJS/vr
Attachments

cc: D. J. Mahoney - w/attachs.

AR202619

STATE OF NEW JERSEY)
) SS.
COUNTY OF UNION)

EX-109-51

A F F I D A V I T

WILLIAM J. STACK, of full age, being duly sworn upon his oath, according to law, deposes and says:

1. I am an attorney for Exxon Company, U.S.A., Post Office Box 222, Linden, New Jersey 07036.

2. I am in receipt of a subpoena issued by the Region III office of the U.S. Environmental Protection Agency pursuant to 15 U.S.C. § 2610(c) which required the production of certain documents as more particularly described on an attached Schedule A.

3. I hereby have caused to be delivered to Mr. Paul Laskow, Esq., an attorney representing the Region III office of the U.S. Environmental Protection Agency, the enclosed documents pursuant to said subpoena.

4. These documents comprise, to the best of my knowledge and belief, all of the documents relating to the parties named in the subpoena and which were in the possession of Exxon Company, U.S.A. and Exxon Chemical Company U.S.A.

5. All of the above documents have been made and maintained in the ordinary course of business and, to the best of my knowledge and belief, have not been altered in any way.

6. The above documents have been delivered by messenger service to the Region III office of the U.S. Environmental Protection Agency pursuant to an agreement between myself and Mr. Paul Laskow, Esq.

7. Mr. Paul Laskow, Esq., on behalf of the U.S. Environmental Protection Agency, has acknowledged receipt of all said documents by executing the signature block provided below.

W. J. Stack
WILLIAM J. STACK, ESQ.

AR202620

Subscribed and sworn to
before me this 23rd day
of April 1980.

Sharon G. Gordin

SHARON GORDIN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 4, 1984
Qualified to Take Oaths

I hereby acknowledge receipt of all documents listed on the
attached Schedule A.

Ruthanne Gordon
Ruthanne Gordon, Esq.

PAUL LASKOW, ESQ.

MAY
~~April~~ 7, 1980

Witness:

By: Ann E. Reink
MAY
~~April~~ 7, 1980

AR202621

The documents assembled for transmittal to the U.S. Environmental Protection Agency include the following:

- A. Contract documents, miscellaneous correspondence, purchase orders, invoices and shipping documents pertaining to the removal of white oil clays and filter media from the Bayway complex.
- B. Contract documents, miscellaneous file materials, shipping documents and invoices pertaining to the removal of materials from the Bayonne Plant.
- C. Contract documents, miscellaneous file materials, shipping documents and manifests pertaining to the removal of materials from the Bayonne Plant.
- D. Manifests pertaining to the removal of materials from the Bayway complex.
- E. Manifests pertaining to the removal of materials from the Bayway complex.
- F. Manifests pertaining to the removal of materials from the Bayonne Plant.
- G. Contract documents, shipping documents and invoices pertaining to the removal of materials from the Bayonne Plant.
- H. File summaries of manifests.
- I. Invoices for removal of materials from the ^{Bayonne} Bayway complex.
- J. Invoices for removal of materials from the Bayway complex.
- K. Miscellaneous file materials and correspondence from contract files.
- L. Miscellaneous file materials and correspondence from correspondence files.

206331

AR202622

E

U.S.A.

EXXON
CHEMICALS

P.O.

BAY
G. L.
Man

November 29, 1979

Slop Oil Shipments to
Hudson Oil Refining Co.

Mr
Bu
90
Wi

De

The attached sheets contain the data requested by Mr. John Purcell in his letter dated November 5, 1979. We understand that these data will be used in your investigation of Hudson Oil Refining Co.

It should be noted that the existing contract with Hudson covers only our Slop Oil streams at our Bayway and Bayonne Chemical Plants. These plants manufacture additives for engine oil and, as such, the slop streams are essentially 100% oil.

If you have any questions, please call me at (201) 474-7477.

Very truly yours,

G. L. OTIS

BY:

C. R. Ball

C. R. Ball

CRB/eds
Attach.

AR202623

SHIPMENTS OF SLOP OIL
TO HUDSON OIL REFINING CO.
JANUARY, 1978-OCTOBER, 1979

ARZ52624

SHIPMENTS OF SLOP OIL
TO HUDSON OIL REFINING CO.
JANUARY, 1978-OCTOBER, 1979

<u>Date</u>	<u>Quantity Gallons</u>	<u>Date</u>	<u>Quantity Gallons</u>	<u>Date</u>	<u>Quantity Gallon</u>
11/25/78	5,174	12/21/79	5,220	12/18/79	5,323
11/26/78	5,071	12/22/79	5,261	12/19/79	6,033
11/28/78	5,040	12/23/79	4,714	12/20/79	5,867
11/29/78	5,170	12/24/79	5,210	12/21/79	5,885
11/30/78	4,037	12/25/79	5,700	12/22/79	4,803
12/1/79	5,000	12/26/79	5,173	12/23/79	5,871
12/2/79	5,000	12/27/79	4,963	12/24/79	6,074
12/3/79	5,000	12/28/79	5,697	12/25/79	5,903
12/4/79	5,018	12/29/79	5,553	12/26/79	5,290
12/5/79	5,000	12/30/79	4,912	12/27/79	6,302
12/6/79	5,000	12/31/79	4,951	12/28/79	5,123
12/7/79	5,000	12/32/79	5,263	12/29/79	2,811
12/8/79	4,000	12/33/79	671	12/30/79	4,631
12/9/79	4,000	12/34/79	6,057	12/31/79	5,777
12/10/79	5,000	12/35/79	6,187	12/32/79	6,172
12/11/79	5,000	12/36/79	1,500	12/33/79	5,695
12/12/79	5,000	12/37/79	5,020	12/34/79	5,585
12/13/79	5,000	12/38/79	5,134	12/35/79	3,481
12/14/79	5,000	12/39/79	6,247	12/36/79	5,947
12/15/79	5,000	12/40/79	3,390	12/37/79	5,740
12/16/79	5,000	12/41/79	4,948	12/38/79	4,022
12/17/79	5,000	12/42/79	5,212	12/39/79	5,767
12/18/79	5,000	12/43/79	6,004	12/40/79	5,323
12/19/79	5,000	12/44/79	4,322	12/41/79	5,250
12/20/79	5,000	12/45/79	5,553	12/42/79	4,107
12/21/79	5,000	12/46/79	5,583	12/43/79	5,568
12/22/79	5,000	12/47/79	4,844	12/44/79	5,490
12/23/79	5,000	12/48/79	4,554	12/45/79	5,865
12/24/79	5,000	12/49/79	5,218	12/46/79	4,871
12/25/79	5,000	12/50/79	5,210	12/47/79	6,079
12/26/79	5,000	12/51/79	2,936	12/48/79	5,346
12/27/79	5,000	12/52/79	5,108	12/49/79	6,476
12/28/79	5,000	12/53/79	5,510	12/50/79	6,144
12/29/79	5,000	12/54/79	4,734	12/51/79	5,200
12/30/79	5,000	12/55/79	5,660	12/52/79	3,355
12/31/79	5,000	12/56/79	5,797	12/53/79	5,225
12/32/79	5,000	12/57/79	5,372	12/54/79	5,096
12/33/79	5,000	12/58/79	5,570	12/55/79	5,485
12/34/79	5,000	12/59/79	4,803	12/56/79	5,652
12/35/79	5,000	12/60/79	5,225	12/57/79	6,162
12/36/79	5,000	12/61/79	4,806	12/58/79	5,505
12/37/79	5,000	12/62/79	5,642	12/59/79	5,503
12/38/79	5,000	12/63/79	5,880	12/60/79	6,000
12/39/79	5,000	12/64/79	5,865	12/61/79	5,370
12/40/79	5,000	12/65/79	5,300	12/62/79	5,867
12/41/79	5,000	12/66/79	5,752	12/63/79	5,807
12/42/79	5,000	12/67/79	4,875	12/64/79	5,685
12/43/79	5,000	12/68/79	5,301	12/65/79	5,530
12/44/79	5,000	12/69/79	4,756	12/66/79	3,692
12/45/79	5,000	12/70/79	4,510	12/67/79	5,031
12/46/79	5,000	12/71/79	4,930	12/68/79	5,790
12/47/79	5,000	12/72/79	5,245	12/69/79	5,697
12/48/79	5,000	12/73/79	5,617	12/70/79	5,126
12/49/79	5,000	12/74/79	5,762	12/71/79	5,777
12/50/79	5,000	12/75/79	5,450	12/72/79	5,150
12/51/79	5,000	12/76/79	4,886	12/73/79	5,350
12/52/79	5,000	12/77/79	5,892	12/74/79	5,044
12/53/79	5,000	12/78/79	5,170	12/75/79	5,712
12/54/79	5,000	12/79/79	5,570	12/76/79	6,299
12/55/79	5,000	12/80/79	5,790	12/77/79	5,650
12/56/79	5,000	12/81/79	5,607	12/78/79	5,730
12/57/79	5,000	12/82/79	5,710	12/79/79	5,755
12/58/79	5,000	12/83/79	5,268	12/80/79	5,450
12/59/79	5,000	12/84/79	5,515	12/81/79	5,717
12/60/79	5,000	12/85/79	5,340	12/82/79	6,242
12/61/79	5,000	12/86/79	5,460	12/83/79	5,810
12/62/79	5,000	12/87/79	5,443	12/84/79	5,670
12/63/79	5,000	12/88/79	5,443	12/85/79	5,670

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SHIPMENTS OF SLOP OIL
TO HUDSON OIL REFINING CO.
JANUARY, 1978-OCTOBER, 1979

Date	Quantity Gallons	Date	Quantity Gallons	Date	Quantity Gallons
1/31/79	5.547	2/9/79	5.977	2/21/79	5.371
2/31/79	6.037	2/11/79	5.320	2/17/79	5.737
3/31/79	5.970	2/14/79	5.653	2/27/79	5.755
4/1/79	6.057	2/17/79	5.530	3/21/79	5.321
4/17/79	5.660	2/18/79	5.672	3/21/79	5.660
4/30/79	6.157	3/4/79	5.742	3/31/79	6.274
5/11/79	6.047	3/27/79	6.212	4/31/79	6.677
5/11/79	5.584	4/2/79	4.84	5/2/79	5.575
5/11/79	5.972	4/12/79	6.269	5/12/79	5.777
5/13/79	5.513	4/22/79	5.520	5/24/79	6.135
5/25/79	6.285	5/22/79	6.660	5/31/79	6.390
6/26/79	6.480	5/26/79	6.652	6/28/79	5.220
6/27/79	6.030	5/27/79	6.247	6/16/79	5.813
6/28/79	5.747	5/27/79	5.595	6/27/79	5.823
6/6/79	5.817	5/27/79	5.810	6/16/79	5.369
6/24/79	6.142	5/27/79	5.810	6/17/79	4.464
6/13/79	5.545	5/27/79	5.270	6/17/79	5.478
6/24/79	6.224	5/27/79	5.752	6/17/79	5.720
6/18/79	5.510	5/27/79	5.712	6/17/79	5.475
6/31/79	5.340	5/27/79	4.940	6/17/79	5.565
6/31/79	5.692	5/27/79	6.277	6/17/79	5.670
6/31/79	5.473	6/26/79	6.592	6/17/79	4.500
6/31/79	5.450	6/26/79	5.907	6/17/79	5.146
6/31/79	4.751	6/26/79	5.543	6/17/79	5.731
6/31/79	5.525	6/26/79	6.227	6/17/79	5.563
6/31/79	5.101	6/26/79	5.832	6/17/79	5.167
6/31/79	6.022	6/26/79	5.937	6/17/79	5.171
6/31/79	4.931	6/26/79	5.692	6/17/79	5.935
6/31/79	5.712	6/26/79	5.725	6/17/79	5.697
6/31/79	5.567	6/26/79	6.219	6/26/79	5.987
6/31/79	5.013	6/26/79	4.644	6/26/79	5.677
6/31/79	4.590	6/26/79	5.443	6/26/79	5.191
6/31/79	6.272	6/26/79	5.349	6/26/79	5.485
6/31/79	6.312	6/26/79	5.180	6/26/79	5.520
6/31/79	4.344	6/26/79	4.761	6/26/79	5.543
6/31/79	5.650	6/26/79	5.712	6/26/79	5.590
6/31/79	6.262	6/26/79	5.935	6/26/79	6.630
6/31/79	6.107	6/26/79	4.676	6/26/79	5.405
6/31/79	4.464	6/26/79	5.580	6/26/79	5.191
6/31/79	5.616	6/26/79	5.173	6/26/79	5.727
6/31/79	5.592	6/26/79	5.124	6/26/79	5.480
6/31/79	5.264	6/26/79	5.907	6/26/79	6.099
6/31/79	5.270	6/26/79	6.142	6/26/79	5.395
6/31/79	5.133	6/26/79	5.892	6/26/79	5.650
6/31/79	5.717	6/26/79	5.161	6/26/79	
6/31/79	4.372	6/26/79	6.119	6/26/79	4.554
6/31/79	4.414	6/26/79	5.645	6/26/79	5.627
6/31/79	6.204	6/26/79	5.552	6/26/79	5.186
6/31/79	5.642	6/26/79	6.561	6/26/79	5.415
6/31/79	5.977	6/26/79	5.850	6/26/79	5.920
6/31/79	5.121	6/26/79	6.109	6/26/79	4.961
6/31/79	4.769	6/26/79	5.550	6/26/79	4.529
6/31/79	5.635	6/26/79	4.751	6/26/79	5.438
6/31/79	4.981	6/26/79	4.968	6/26/79	5.440
6/31/79	4.257	6/26/79	5.275		
6/31/79	5.721	6/26/79	5.233		
6/31/79	5.112	6/26/79	5.725		
6/31/79	5.340	6/26/79	5.483		
6/31/79	5.362	6/26/79	6.077		
6/31/79	5.113	6/26/79	5.312		
6/31/79	5.322	6/26/79	5.255		
6/31/79	5.370	6/26/79	6.279		
6/31/79	5.877	6/26/79	272		
6/31/79	3.021	6/26/79	5.171		
6/31/79	4.152	6/26/79	4.751		
6/31/79	5.143	6/26/79	5.740		

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BAYONNESHIPMENTS OF SLOP OIL
TO HUDSON OIL REFINING CO.
JANUARY, 1978-OCTOBER, 1979

<u>Date</u>	<u>Quantity Gallons</u>	<u>Date</u>	<u>Quantity Gallons</u>	<u>Date</u>	<u>Quantity Gallons</u>
1/4/78	6646	9/13	5485	5/21	5790
1/10	5869	9/14	4989	5/22	5278
1/10	5869	9/14	4847	6/1	5452
1/10	5869	9/16	5143	6/8	5919
1/10	5869	9/21	3523	6/27	6634
1/11	4210	9/21	5257	7/3	5721
1/24	5503	9/23	5118	7/18	4961
2/23	5280	9/27	5232	7/19	5240
3/6	5443	10/5	5379	8/6	6081
3/6	5443	10/09	4458	8/8	6484
3/6	5443	10/09	4458	8/16	5959
3/6	5443	10/19	4824	8/20	5260
3/6	5443	10/27	6150	8/22	5549
3/22	6284	10/28	5861	8/24	3572
4/3	5511	11/1	5080	8/27	5688
4/3	4760	11/6	5290	9/10	5782
4/10	6383	11/9	5452	9/11	5562
4/14	5926	11/10	5729	9/12	5323
4/14	4867	11/20	5539	9/13	5643
4/17	6510	11/22	5554	10/2	3906
4/21	4292	11/22	5881	10/11	5845
4/28	5635	11/29	5138	10/16	5158
5/1	5290	11/30	5285	10/17	4023
5/8	6394	11/30	6000	10/19	5262
5/8	6394	12/12	5485	10/22	2767
5/17	5805	12/13	6575	10/27	6000
5/18	6793	12/19	5432		
5/19	6106	12/29	6000		
5/26	5313	12/29	6000		
6/5	5120				
6/8	5995	1/8/79	4365		
6/8	5668	1/9	5914		
6/8	5790	1/18	5450		
6/10	4436	2/2	5858		
6/16	5316	2/7	6056		
6/23	5331	2/21	5711		
6/28	5503	3/2	6180		
6/30	5255	3/12	6494		
6/30	5098	3/14	5947		
7/5	6798	3/26	5278		
7/6	6124	3/30	5534		
7/10	5204	4/3	4968		
7/14	5761	4/4	5658		
7/26	5516	4/12	3683		
8/8	5544	4/20	5594		
8/14	5435	4/26	5009		
8/17	7077	4/30	5668		
8/17	5567	5/7	5589		
8/22	5790	5/14	6038		
8/22	4814	5/14	5967		
8/30	5698	5/17	5054		
		5/17	5774		

AR202627

TYPICAL SLOP OIL ANALYTICAL RESULTS

Bottoms Sediment & Water (BS&W) 4% (trace H₂O)

Metals	Ba	.15%
	Ca	.32%
	Zn	.13%
	S	1.42%
	P	.10%
	N	.08%

% Volatiles @ 120°F = 33

pH 8.2

Viscosity @ room temp. (~ 75°F) = 93 cs

Appearance non-layered

Flash 200°F (COC)

Ash 1.6%

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